

JOHN O'GRADY  
CLERK OF THE FRANKLIN COUNTY COMMON PLEAS COURT, COLUMBUS, OHIO 43215  
CIVIL DIVISION

AMANDA HAWKINS  
6527 PASQUE COURT  
WESTRVILLE, OH 00000-0000,

PLAINTIFF,

VS.

ANHEUSER-BUSCH INC  
1 BUSCH PLACE  
ST LOUIS, MO 63118-0000,

05CVC-06-6415

CASE NUMBER

DEFENDANT.

\*\*\*\* SUMMONS \*\*\*\*

06/13/05

TO THE FOLLOWING NAMED DEFENDANT:

ANHEUSER-BUSCH INC  
1 BUSCH PLACE  
ST LOUIS, MO 63118-0000

YOU HAVE BEEN NAMED DEFENDANT IN A COMPLAINT FILED IN FRANKLIN COUNTY  
COURT OF COMMON PLEAS, FRANKLIN COUNTY HALL OF JUSTICE, COLUMBUS, OHIO,  
BY: AMANDA HAWKINS  
6527 PASQUE COURT  
WESTRVILLE, OH 00000-0000,

PLAINTIFF(S).

A COPY OF THE COMPLAINT IS ATTACHED HERETO. THE NAME AND ADDRESS OF  
THE PLAINTIFF'S ATTORNEY IS:

ALEXANDER SPATER  
SPATER LAW OFFICE  
565 EAST TOWN STREET  
COLUMBUS, OH 43215-0000

YOU ARE HEREBY SUMMONED AND REQUIRED TO SERVE UPON THE PLAINTIFF'S  
ATTORNEY, OR UPON THE PLAINTIFF, IF HE HAS NO ATTORNEY OF RECORD, A COPY  
OF AN ANSWER TO THE COMPLAINT WITHIN TWENTY-EIGHT DAYS AFTER THE SERVICE  
OF THIS SUMMONS ON YOU, EXCLUSIVE OF THE DAY OF SERVICE. YOUR ANSWER  
MUST BE FILED WITH THE COURT WITHIN THREE DAYS AFTER THE SERVICE OF A  
COPY OF THE ANSWER ON THE PLAINTIFF'S ATTORNEY.

IF YOU FAIL TO APPEAR AND DEFEND, JUDGMENT BY DEFAULT WILL BE RENDERED  
AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

JOHN O'GRADY  
CLERK OF THE COMMON PLEAS  
FRANKLIN COUNTY, OHIO

BY: SANDY THOMAS, DEPUTY CLERK

EXHIBIT A

**IN THE FRANKLIN COUNTY COURT OF COMMON  
PLEAS, CIVIL DIVISION**

**AMANDA HAWKINS  
6527 PASQUE COURT  
WESTERVILLE, OHIO,**

**KATHRYN JACKSON  
1191 DUTCH LANE  
NEWARK, OHIO 43055,**

**CHERRI HILL  
3159 CROSSGATE ROAD  
COLUMBUS, OHIO 43232,**

**and**

**JACKIE CUNNINGHAM  
P.O. BOX 29324  
COLUMBUS, OHIO 43229-0324,**

**PLAINTIFFS,**

**-VS-**

**ANHEUSER-BUSCH, INC.,  
1 BUSCH PLACE  
ST. LOUIS, MO. 63118,**

**DEFENDANT.**

**05CVC 06 6415**

**CASE NO.**

**FILED  
COMMON PLEAS COURT  
FRANKLIN CO. OHIO  
2005 JUN 13 PM 4:46  
CLERK OF COURTS**

**COMPLAINT-JURY DEMAND ENDORSED HEREON**

1. All of the plaintiffs are women who have been employees at the factory owned by defendant in Columbus, Ohio.
2. Plaintiffs Hill, Cunningham, and Hawkins and other women employees of defendant were subjected to a sexist and sexually harassing environment that was perpetrated by a male employee, Bill Robinson (hereinafter Robinson), and that was condoned and perpetuated by defendant. The

sexist and sexually harassing environment included, but was not limited to, sexually oriented statements, solicitations for sex, physical contact, and threats.

3. After plaintiff Hill complained about the sexual harassment to management of defendant, she was retaliated against. The retaliation included the burning of her jeep.

4. Plaintiff Jackson complained to management of defendant that she had observed Robinson sexually harassing Hawkins, she suffered retaliation by employees of defendant, that included her house being destroyed by fire.

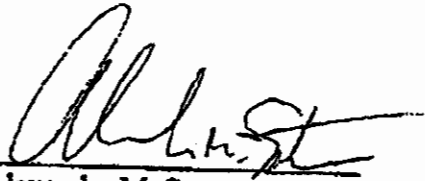
5. Defendant knew, or had reason to know, that Robinson has sexually harassed women employees and that he endangered the lives of women employees. Defendant, nevertheless, did not remove him from the working environment, so that he could threaten, sexually harass, and physically harm women employees, including the plaintiffs in this Action. Defendant also did not protect women whom it knew or had reason to know would be harmed by Robinson.

6. Plaintiffs suffered a loss of wages and mental and emotional distress because of defendant's conduct.

7. Defendant's acts that have been alleged above were done maliciously and with wrongful disregard for the rights of the plaintiffs.

8. Defendant, by committing the acts alleged above, discriminated against the plaintiffs on account of their sex and in retaliation against plaintiffs because they opposed sexually harassing acts and practices, in violation of O.R.C. 4112.02, for which plaintiffs may sue under O.R.C. 4112.99.

WHEREFORE, plaintiffs request that they be awarded compensatory and punitive damages, plus reasonable attorneys fees and costs.



Alexander M. Spater (0031417)

Michael Beaver (0078258)

SPATER LAW OFFICE

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Columbus, OH 43215

(614) 222-4734

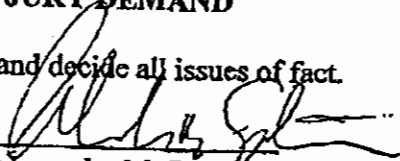
Fax (614) 222-4738

email-sspater@spaterlaw.com

Attorneys for Plaintiffs

**JURY DEMAND**

Plaintiffs request a jury to hear and decide all issues of fact.



Alexander M. Spater